NAGPRA
Consultation/Documentation Grants: Analysis of Final Reports

Report compiled by Kelsea Raether, 2011 Washington, D.C. Study Away Program Intern, B.A. Anthropology, Michigan State University.

Front Cover Picture: Burke Museum and Central Washington University joint inter-tribal repatriation of human remains and funerary objects from the Columbia Plateau to the Confederated Tribes of the Coleville Reservation, WA, Nez Perce Tribe, ID, Confederated Tribes of the Umatilla Reservation, OR, Confederated Tribes of Warm Springs Reservation, OR, Confederated Tribes and Bands of the Yakama Nation, WA and the Wanapum Band, WA.
(FY2007 Repatriation Grant) (Photo used with permission from the Burke Museum)

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I. INTRODUCTION

The goal of the National NAGPRA Grants Program (hereafter Program) is to increase the number of successful repatriations through support for projects. These projects increase the ability of tribes and museums to facilitate consultations and work together through the NAGPRA process. Since 1994, Congress has provided funds to enable the award of over 704 grants, totaling $36.5 million in funds to Indian tribes, Native Hawaiian organizations and museums to support a wide range of NAGPRA-related projects. For a full review of the NAGPRA Grants Program from its inception in 1994 to 2008, refer to the prior report, Journeys to Repatriation, available at www.nps.gov/NAGPRA.

At the conclusion of each NAGPRA grant project, a Final Report is submitted to the Program. For the grants awarded in 2007, the Final Report was revised to better measure results and capture the full range of work produced by NAGPRA grantees. This report analyzes the results of the Fiscal Year 2007 grants, which fully closed at the end of FY 2011. This was the first group to complete the new Final Report form. This report will also provide a template for evaluating subsequent years and can be used to evaluate the form.

Prior to FY2007, the Final Report form confirmed the completion of deliverables, but it did not provide a means for measuring outcomes or documenting the full scope of the work performed by grantees with NAGPRA grant funds. Many valuable experiences, partnerships, consultations, trainings and other auxiliary products were not recorded. In addition, the forms did not allow the Program to assess the cumulative progress of NAGPRA grantees' endeavors.

In an effort to document the full range of achievements accomplished with NAGPRA grant funds, the Final Report now includes a variety of quantitative and qualitative questions that allow the grantee to document deliverables. Specific information is requested on activities related to consultations, completion of notices, trainings, outreach, community involvement, and partnerships. An additional section requests comments on obstacles, future plans and suggestions for the improving the Program. This assessment tool enables the Program to measure grantee accomplishments with NAGPRA grant funds, discern trends, and make program improvements.

It is now timely to discuss the class of FY2007 at the close of 2011, as the awardees, as a group, are now in the last stages of project completion. As of the date of this report, all but four awardees of the class of FY 2007 have submitted their Final Reports. It is now possible to evaluate the information received and the effectiveness of the Final Report as a tool for evaluation of grants awarded, the benefits received by NAGPRA communities, and the extent to which the NAGPRA process has been furthered by NAGPRA grants.

The data displayed in this report, for the first time, clearly indicates the broad benefit to communities from NAGPRA grants. The data indicates the number of communities affected as well beyond the grantee. The number of Native American human remains and other cultural items addressed is significant even if all notices have not been accomplished at the time of this report. There are a number of reflections on the positive impact to the NAGPRA process achieved in grants that are discussed throughout and in the conclusion to this report.

Administration of NAGPRA Grants

The enactment in 1990 of the Native American Graves Protection and Repatriation Act (NAGPRA), established a process for the resolution of rights to Native American human remains, funerary objects, sacred objects and objects of cultural patrimony in lineal descendents, Indian tribes, and Native Hawaiian organizations.

Section 10 of the Act authorizes the Secretary of the Interior to make grants to museums, Indian tribes, and Native Hawaiian organizations for the purposes of assisting in consultation, documentation, and repatriation of Native American "cultural items," which includes human remains, funerary objects, sacred objects, and objects of cultural patrimony. Congress began funding NAGPRA grants in 1994, and has supported the program every year since.[1] NAGPRA grants continue to be available pending Congressional appropriation.

The National NAGPRA Program is the support staff to the Secretary of the Interior on NAGPRA administration, including the grants program. Two types of NAGPRA grants are available: Consultation/Documentation Awards (up to $90,000) and Repatriation Awards (up to $15,000).[2] The National NAGPRA Program solicits proposals, administers the grants review process including the selection of an outside review panel, notifies applicants of their awards, and administers the programmatic requirements. In addition, the National NAGPRA Program provides training and technical assistance to both grantees and the public regarding the grants program, application requirements and grants administration.

The National NAGPRA Program is assisted in grants administration by the Historic Preservation Grants Division of the National Park Service, which who oversees the financial requirements of grants to ensure compliance with Department of the Interior regulations and requirements governing grants as stipulated in Office of Management and Budget Circulars A-110 (Uniform Administrative Requirements), A-87 (Cost Principles), and A-133 (Audit Requirements).

The Final Report Form

The Final Report form is comprised of six parts. As they appear in order on the form, the parts are:

Part I- Administrative
This section asks the grantee to "list any amendments to their original Grant Agreement." Amendments include extensions and/or modifications to the Scope of Work (Condition 14 of the Grant Agreement) or Budget modifications (Condition 15 of the Grant Agreement). Not all grantees will have something to report in this section. The grantee is required to provide the approval dates.

Part II- Project Description
This section asks six questions in order to capture the work conducted during the grant period. The **first** question asks the grantee to "briefly summarize the results of the project accomplished under this grant." Grantees provide a set of activities and expected deliverables in the grant application; this question allows the grantee to report on what was actually accomplished. As

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[1] See "Journeys to Repatriation," www.nps.gov/NAGPRA for a comprehensive review of funding.
[2] NAGPRA Consultation/Documentation grants were originally for up to $75,000. In FY2008 the NAGPRA Review Committee recommended an increase in Consultation/Documentation grant award amounts from $75,000 to $90,000 due to a rise in project costs. This was implemented in FY2009.

plans and intentions can change, the **second** question asks grantees to specifically identify and "describe any differences between the planned results as listed under Conditions 14 (Scope of Work) and 16 (Deliverables) of the Grant Agreement and the actual results." This question identifies many factors, such as the levels of success, challenges and achievements. The **third** question asks grantees to "identify all key partners and participants (museums, tribes, institutions, individuals) in the grant and briefly describe their participation in the project." This question discloses the full extent of the impact of the grant on numerous tribal and Hawaiian communities and museums. The **fourth** question asks grantees to discuss, beyond the grant deliverables, the larger impact of the project on their community. The **fifth** question asks, "as applicable, [to] explain any plans for ongoing funding, expansion, modification or replication of the project." Through the answers to this question, the Program can determine the future needs of grant applicants. The **sixth** question asks for "any other data required by the Grant Agreement's NPS Special Condition or instructions." Special Conditions refer to administrative, programmatic or financial requirements placed by the National Park Service on the grant, rather than grant outcomes and thus is not addressed in this report.

Part III- Financial Information
This section asks for a final budget and financial documents relating to the grant. None of the information is relevant to this report, unless there are instances of unsuccessful grants where further guidance might be given.

Part IV- Experience
This section relates to the grantee experience in implementing the grant. Answers to these questions "will help the Program improve its support to museums and tribes in their efforts to effectively meet the goals of NAGPRA." There are three questions in this section. The **first** question asks "other than funding, what were the major obstacles you faced in implementing the grant?" In knowing the challenges grantees face, the Program can better assist grantees in overcoming the challenges or develop solutions. The second question asks grantees to "provide two specific suggestions of how the Program could better support [their] grant implementation efforts." This question allows for future programmatic improvement. The **third** question provides space for any additional comments or thoughts.

Part V- Attachments
This section asks for "a copy of any products required by Condition 16 of the Grant Agreement" and one copy of any publications produced with assistance from the grant. This refers to the deliverables grantees are required to submit at the completion of their grant. None of the information provided in this section is analyzed in this report.

Part VI- Statistical Information
This section asks for number values relating to grant activities. There are three pieces to this section, Repatriation, Education/Training and Community Involvement. Some of the information reported in this section is the quantitative (numerical) form of the qualitative (descriptive) answers to the above questions. For example, this information is reported as the number of tribes, museums, other institutions and individuals participating in the grant, number of persons receiving training and/or number of notices published as a consequence of the grant. (For exact report questions see Part V of this report).

Information in this Report

This report provides a comprehensive analysis of FY2007 grants, using the publicly available data in Program information and as provided by the grantees in the Final Reports. This information includes:

- A list of Consultation/Documentation Grants awarded and not awarded. Information is also divided by the applicant states.
- Types of activities conducted in grant projects.
- Length of time to complete grant objectives.
- Reasons for extensions of time to complete the grant projects.
- Differences between planned and actual results.
- Statistical information: the number of consultations conducted, the number of human remains and cultural objects identified for repatriation/disposition, and the number of notices generated.
- Statistical information: trainings and/or workshops presented and attended.
- Statistical information: tribes, museums, other institutions, individuals and consortiums involved as joint participants and individually in grant activities.
- Obstacles faced in implementation.
- The larger impact seen on communities and institutions from grants.
- Ongoing plans for future NAGPRA activity subsequent to the grant.
- Suggestions for improvement of the grants program.

II. CONSULTATION/DOCUMENTATION GRANT DISTRIBUTION

This section looks at the distribution of grants based on the distinction of awarded or not awarded, by museum or tribe, and by state. Grantee applicant information is listed and illustrated. The purpose of this section is to highlight the distribution of funds by location and by museum or tribe. The distribution of grants awarded or not, by tribe and museum responds to questions received in the Program regarding equitable distribution of awards and funds. In response, that information is made available here. There does not appear to be a significant difference in the success or failure of a grant request depending on whether it was initiated by a museum or tribe.

This report does not look at why some projects were funded and others were not. That requires a separate analysis and input from the grants panel. Detailed, written, specific information from each panelist for each request, began in FY 2011. Therefore, the focus of this report is upon the information to be gleaned from the awardee as self-reported in the Final Report instrument.

In FY2007, a total of 30 consultation/ documentation grants were awarded[3] a total of $1,830,105. Nine museums received 10 grants amounting to $538,215 and 19 tribes received 20 grants amounting to $1,292,070. Ten of thirteen museum projects were funded and twenty of twenty-nine tribal projects were funded. Museums experienced a slightly higher percentage of success in receiving funding, although with a smaller number of requests. Tribes received two-thirds of the awards and slightly more than two thirds of the funds, with slightly less than two-thirds of the requests.

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[3] As of November 2011, all but four of the 30 grantees had submitted Final Reports .

Consultation/Documentation Grants Awarded

Listed below are the recipients of grants in FY2007. Provided is the number assigned to each grant, the recipient's name, state, and the amount awarded.

	CONSULTATION/DOCUMENTATION GRANTS AWARDED- FY2007			
Grant #	**Recipient**	**State**	**Tribe**	**Award Amount**
02-07-GP-440	Alutiiq Museum & Archaeological Repository	Alaska		$56,049
30-07-GP-441	Assiniboine and Sioux Tribes of the Fort Peck Indian Reservation	Montana	X	$70,710
55-07-GP-442	Bad River Band of the Lake Superior Tribe of Chippewa Indians	Wisconsin	X	$73,888
40-07-GP-443	Caddo Nation of Oklahoma	Oklahoma	X	$73,626
02-07-GP-467	Central Council of the Tlingit & Haida Indian Tribes of Alaska	Alaska	X	$74,862
02-07-GP-444	Chilkoot Indian Association (Haines)	Alaska	X	$74,629
53-07-GP-448	Confederated Tribes and Bands of the Yakama Nation	Washington	X	$74,511
41-07-GP-445	Confederated Tribes of the Umatilla Indian Reservation	Oregon	X	$11,641
41-07-GP-446	Confederated Tribes of the Umatilla Indian Reservation	Oregon	X	$21,002
41-07-GP-447	Confederated Tribes of the Warm Springs Reservation of Oregon	Oregon	X	$74,984
53-07-GP-449	Cowlitz Indian Tribe	Washington	X	$74,993
32-07-GP-450	Duckwater Shoshone Tribes of the Duckwater Reservation	Nevada	X	$75,000
40-07-GP-451	Eastern Shawnee Tribe of Oklahoma	Oklahoma	X	$66,641
53-07-GP-452	Eastern Washington State Historical Society	Washington		$59,382
17-07-GP-453	Field Museum of Natural History	Illinois		$21,408
17-07-GP-454	Field Museum of Natural History	Illinois		$34,326
02-07-GP-455	Hydaburg Cooperative Association	Alaska	X	$74,881
26-07-GP-457	Lac Vieux Desert Band of Lake Superior Chippewa Indians	Michigan	X	$69,305
04-07-GP-458	Museum of Northern Arizona	Arizona		$50,904
41-07-GP-459	Oregon State University, Department of Anthropology	Oregon		$72,694
36-07-GP-461	Rochester Museum of Nature & Science	New York		$75,000
06-07-GP-462	San Diego Museum of Man	California		$63,921
02-07-GP-463	Sealaska Corporation	Alaska	X	$70,790
06-07-GP-464	Smith River Rancheria	California	X	$73,960
06-07-GP-466	Susanville Indian Rancheria	California	X	$75,000
08-07-GP-468	University of Colorado, Boulder	Colorado		$75,000
Grants Not Closed as of November 2011				
06-07-GP-456	Karuk Tribe of California	California	X	$75,000
06-07-GP-460	Robinson Rancheria of Pomo Indians of California	California	X	$72,454
41-07-GP-465	Southern Oregon University	Oregon		$29,531
04-07-GP-469	Yavapai-Apache Nation of the Camp Verde Indian Reservation	Arizona	X	$14,013
			TOTAL:	$1,830,105

Consultation/Documentation Applicants Not Awarded

Listed below are the applicants whose grant proposals were not funded in FY2007. Provided is the recipient's name, state, and the amount requested.

In FY2007, a total of 15 grant requests were not awarded, four from museums and 11 from tribes. Of the 15 applicants, two of the museums and three of the tribes applied for the first time in FY2007. Two tribes have applied before and were not awarded either time.

The total amount not funded was $997,667; museum proposals requested $252,373 and tribal proposals requested $745,294.

CONSULTATION/DOCUMENTATION GRANTS NOT AWARDED- FY2007			
Recipient	**State**	**Tribe**	**Requested Amount**
Paiute-Shoshone Indians of the Bishop Community of the Bishop Colony	California	X	$67,718
Bernice P. Bishop Museum	Hawaii		$74,965
Confederated Salish & Kootenai Tribes of the Flathead Reservation	Montana	X	$74,994
Grand Portage Band of the Minnesota Chippewa Tribe	Minnesota	X	$72,736
Jena Band of Choctaw Indians, Louisiana	Louisiana	X	$74,989
Kashia Band of Pomo Indians of the Stewarts Point Rancheria	California	X	$73,711
Lower Sioux Indian Community in the State of Minnesota	Minnesota	X	$74,997
Oregon State University, Horner Collection	Oregon		$74,906*
Petersburg Indian Association (IRA)	Alaska	X	$41,248*
Salisbury House	Iowa		$61,520
Sault Ste. Marie Tribe of Chippewa Indians of Michigan	Michigan	X	$40,953
Seminole Nation of Oklahoma	Oklahoma	X	$74,174
Sisseton-Wahpeton Oyate of the Lake Traverse Reservation	South Dakota	X	$74,774
Soboba Band of Luiseno Indians	California	X	$75,000
St. Joseph Museums, Inc.	Missouri		$40,982
		TOTAL:	$997,667
*Approval dependent on hold backs for repatriation grants. Ultimately the proposals were not funded			

In FY2007, 32 applications were ranked for funding, dependent on available funding. Ultimately, two of the applications were not funded.

In an effort to better support applicants, each receives a letter from the grants coordinator with helpful information from the Grant Review Panel on how the project may be strengthened or, in the case of unsuccessful applications, how the proposal may be strengthened in coming years. In FY 2007, seven previously unsuccessful grant requesting museums or tribes were successful grant awardees. Of the un-awarded FY2007 grantees, two were successful in receiving grants in FY2008.

A summary of the suggestions provided to FY2007 unsuccessful applicants is given below. These suggestions have proved incredibly useful as the Program has seen market improvement in the grant applications. The most common suggestions were provide supporting documents (such as letters of support, personnel resumes and cost quotes) and give greater clarity of the project throughout the proposal. The Program has seen vast improvement with the inclusion of supporting documents following FY2007, after the introduction of an application cover sheet, which provides a grantee with a checklist of all the grant components, the order they need to be submitted in and the number of copies necessary for each component.

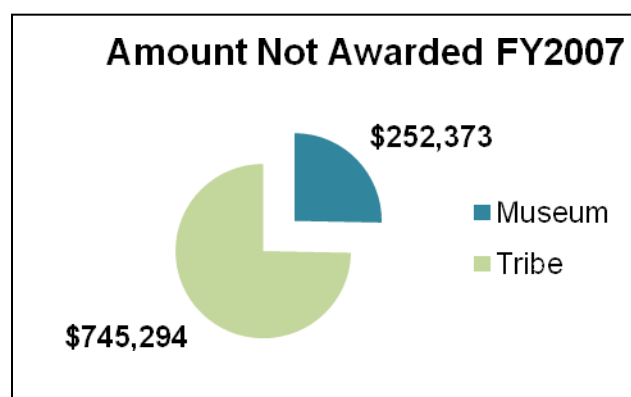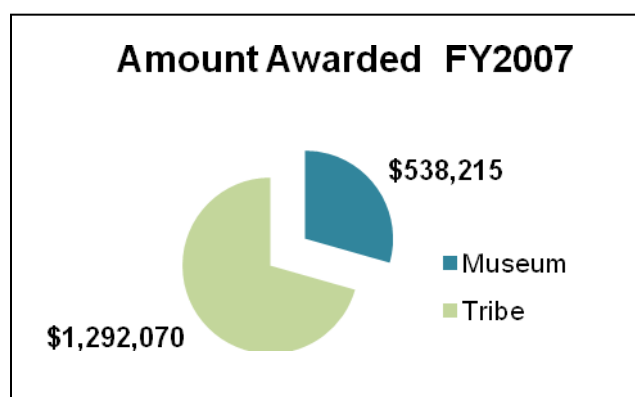**Suggestions provided to museums to improve future proposals:**
- Greater clarity about the project (3)
- Show necessary preparations have been made (1)
- Greater clarity about each budget item and how it is necessary to fulfill the objectives of the project (1)
- Include supporting documents such as support letters from tribes (3)
- Focus on NAGPRA-specific activities (1)
- Include tribal participation (1)

Suggestions provided to museums to improve future proposals:
- Greater clarity about the project (1)
  - NAGPRA activities (2)
  - Have a clearly developed project plan (show necessary preparations have been made) (2)
- Greater clarity of entities involved (2)
- Provide a fuller accounting of personnel involved and their assigned duties (3)
- Include supporting documents
  - support letters from museums (6)
  - Personnel resumes (4)
  - Cost quotes (3)
- Focus on NAGPRA-specific activities (1)

Amounts Awarded and Not Awarded

These two charts display the divisions of amounts awarded and not awarded by museums and tribes. The charts clearly indicate some proportionality between awarded and not awarded by tribes and museums. Simply put, tribes submit more requests for grants and are funded commensurate with the percentage of requests in the pool.

Amount Awarded FY2007 — Museum $538,215; Tribe $1,292,070

Amount Not Awarded FY2007 — Museum $252,373; Tribe $745,294

Distribution of Awards by State

Below are several maps of the United States that highlight FY2007 grant distribution by state. By sorting the grants by state, one can see areas that are actively engaged in NAGPRA grants and those that are not. This information is useful to the program as it highlights the areas that can be focused on to extend the reach of NAGPRA grants, by offering additional training and outreach.

Total Grants Awarded
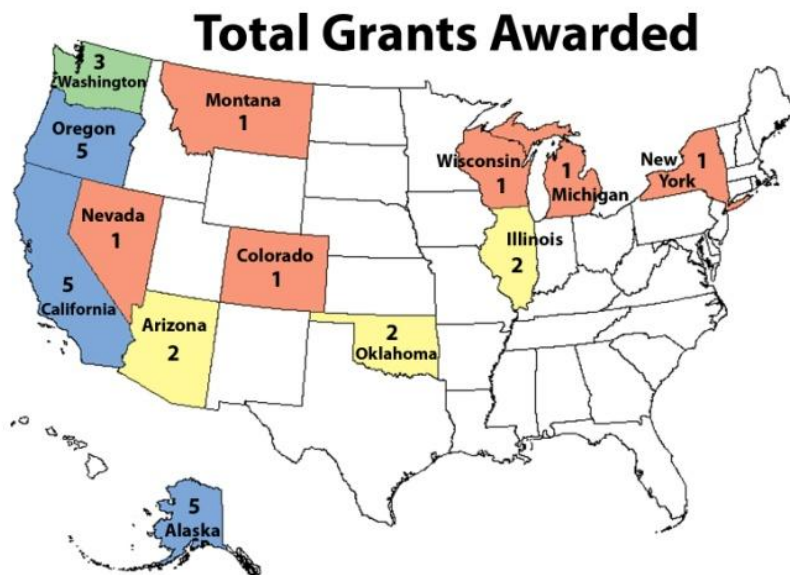
In FY2007, NAGPRA grants were awarded in 13 states. This map shows that the West Coast is actively engaged in receiving grants, while the Southeast is not. The Mid-West and Northeast are moderately active.

Museums Awarded Grants
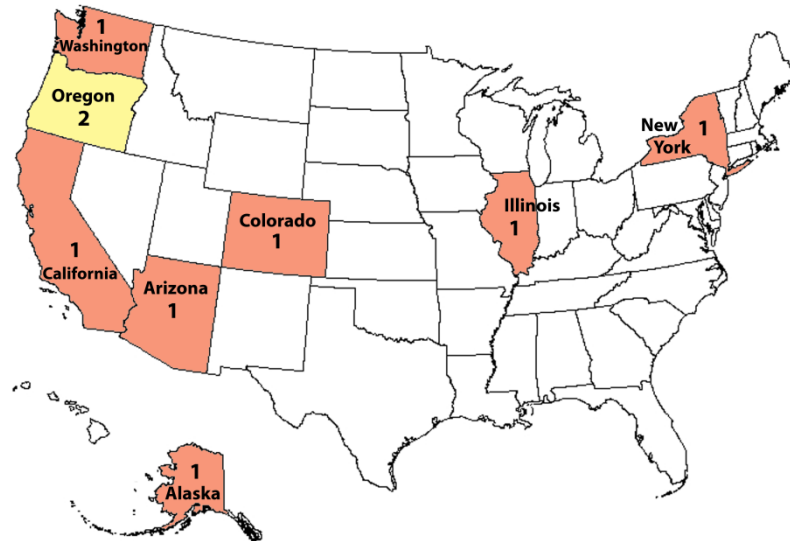
In FY2007, a total of 10 consultation/ documentation grants were awarded to eight museums from seven states. The Field Museum from Illinois received two grants in FY2007.

Tribes Awarded Grants
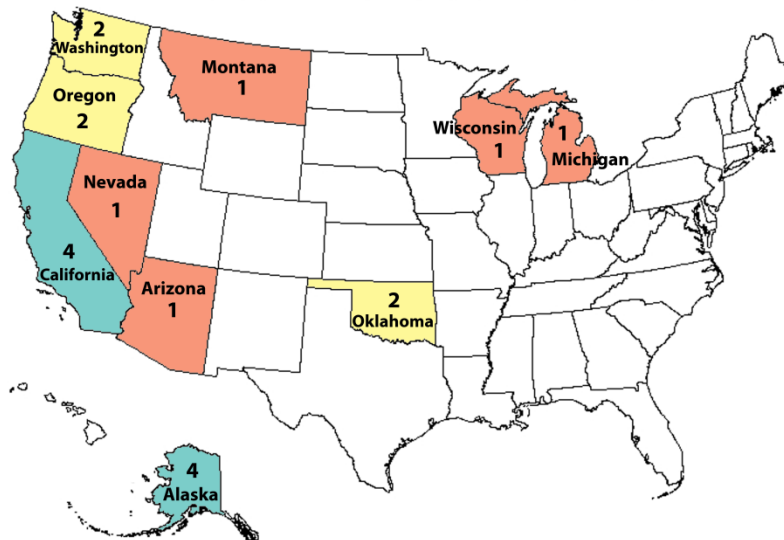
In FY2007, a total of 20 consultation/ documentation grants were awarded to 19 tribes (including one Alaska Native Corporation) from 10 states. The Confederated Tribes of the Umatilla Indian Reservation in Oregon was awarded two grants in FY2007. When compared to the map of museums awarded grants, the tribal map is much heavier on the West Coast and Alaska, which could be credited to the large number of tribes located in these areas. The map demonstrates that throughout FY2007, the West Coast was the most active region conducting NAGPRA activities with grant funding.

Total Grants Not Awarded
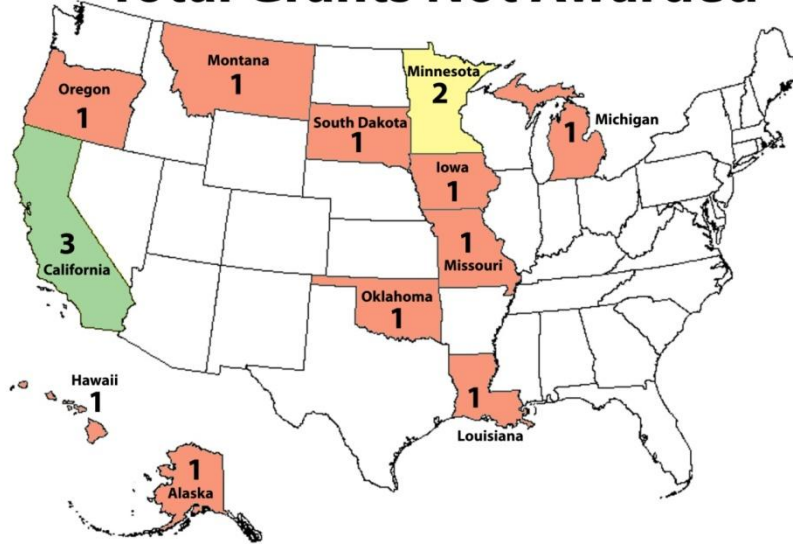
A total of 15 consultation/documentation grants from 12 states were not awarded. Eleven of the un-funded applications were submitted by tribes and four by museums. The tribal applicants were from Alaska, California, Louisiana, Michigan, Minnesota, Missouri, Oklahoma and South Dakota. The museum applications were from Hawaii, Iowa and Montana and Oregon. Grants were not awarded from five states that received grants (Alaska, California, Michigan, Montana, and Oklahoma. A reason the Mississippi Valley states were unsuccessful in receiving NAGPRA grants could be attributed to the lack of trainings available in that region. In FY2007, targeted mailings were sent to museums who had substantial amounts of culturally unidentified items listed on the Program database and tribes that previously applied for, but never received, a NAGPRA grant. More research could be on the effect outreach has on an applicant's success of receiving a grant. For an in-depth look at outreach activities for FY2007 see exhibit 2.

Amounts Awarded

- over $300,000
- over $200,000
- over $100,000
- over $70,000
- over $60,000
- over $50,000
- over $40,000
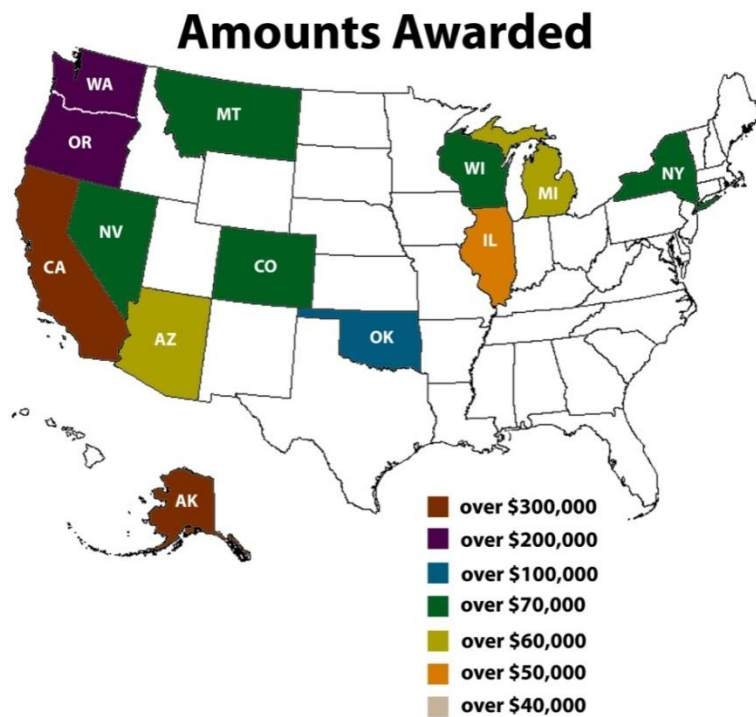
California and Alaska were awarded the most grants in FY2007. Both states received over $300,000 in NAGPRA funding. The Midwest received the fewest number of grants and the least amount of funding.

Amounts Not Awarded

- over $300,000
- over $200,000
- over $100,000
- over $70,000
- over $60,000
- over $50,000
- over $40,000
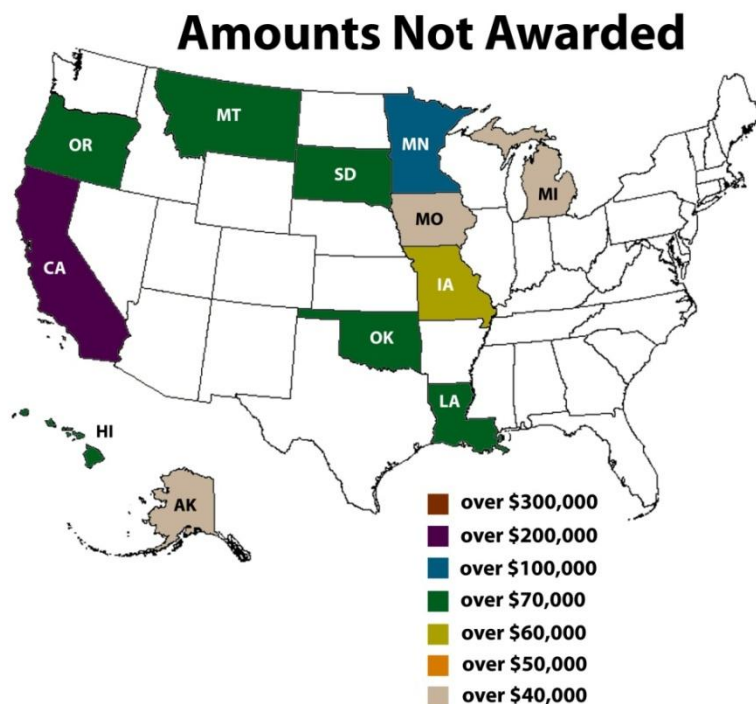
California requested and was not awarded the largest sum of money. Interestingly, California was also the state to receive the most money. The large number of federally-recognized tribes located in California and applying for NAGPRA grants contributes to these numbers. Due to the competitive nature of consultation/documentation grants, not all requests can be awarded. The summary of suggestions provided to unsuccessful applicants shows that the common reasons for not receiving a grant were lack of a clear project and lack of supporting documents. Further study may warrant more specific reasons why certain states receive different amounts of money.

III. GRANT ACTIVITIES AND MODIFICATIONS

This section details the project activities undertaken by grantees. It also analyzes the amount of time it takes to complete a grant and the reasons why extensions were requested and granted.

Project Activities

> **Question: Briefly summarize the results of the project accomplished under this grant. (From Final Report Form- Part II, Question 1)**

In FY2007, a total of 30 consultation/documentation grants were awarded. The chart below documents the types of NAGPRA activities identified by each grantee as completed under their grant.

Grant #	Tribe	Consultation	Research/ Documentation	Training	Database Development	Updating Inventory/ Summary	Work with Tribal Repatriation Committee	Coalition Building	Develop Repatriation Plan	Contamination	Culturally Unidentifiable Research	Host a Conference	Repatriation	Develop Guide for Museums & Federal Agencies
02-07-GP-440		X		X	X			X	X					
30-07-GP-441	X	X	X											
55-07-GP-442	X	X	X		X									
40-07-GP-443	X	X	X			X		X		X				
02-07-GP-444	X	X					X							
41-07-GP-445	X	X	X											
41-07-GP-446	X	X	X								X			
41-07-GP-447	X	X	X											
53-07-GP-448	X	X		X			X		X					
53-07-GP-449	X							X	X					
32-07-GP-450	X	X	X	X			X							
40-07-GP-451	X	X		X	X		X	X						X
53-07-GP-452					X	X								
17-07-GP-453		X								X				
17-07-GP-454		X	X											
02-07-GP-455	X	X	X		X		X		X					
26-07-GP-457	X			X	X	X	X							
04-07-GP-458						X								
41-07-GP-459		X	X	X		X								
36-07-GP-461		X		X						X				
06-07-GP-462		X	X	X		X				X				
02-07-GP-463	X											X	X	
06-07-GP-464	X	X		X	X			X					X	
06-07-GP-466	X	X	X	X				X	X					
02-07-GP-467	X	X	X	X			X							
08-07-GP-468		X										X		
Grants Not Closed as of November 2011														
06-07-GP-456	X													
06-07-GP-460	X													
41-07-GP-465														
04-07-GP-469	X													
TOTALS		21	13	11	8	7	7	6	5	4	3	1	1	1

Understanding Median and Average

In order to understand the information presented next, one must understand what average and median mean and why each is important.

Average is the total number of a data set divided by the number of values in the data set.

Example:

$$\text{Average} = \frac{\text{sum of all data values}}{\text{number of data values}} \qquad \text{Average} = \frac{4 + 6 + 7 + 10 + 13}{5} = 8$$

Median is the middle number in a list of numbers sorted lowest to highest. Exactly half of the list is higher than the median and exactly half the list is lower than the median.

Example:

A data set of the numbers:

9, 16, 22, 11, 17, 20, 14

Arrange them in order from the lowest value to the highest value:

9, 11, 14, 16, 17, 20, 22

The 4th value, 16, is the middle value of the list.

Median = 16

The average is useful for predicting future results when there are no extreme values in the data set. The impact of extreme values on the average can skew the data set and should be considered.

The median is more useful than the average when there are extreme values in the data set as it is not affected by the extreme values. The median shows us what is "typical." Because several of the data sets are affected by extremes the median is also provided.

Amount of Time to Complete a Grant

> **Question: What was the grant period? Start date? End Date?**
> **(From Final Report Form- Grant Information)**

This analysis shows that it often takes longer to complete a NAGPRA grant than the originally allotted 18 months.

In FY2007, the average consultation/documentation grant took 22 months to complete (median: 22.5) with 71% of grantees requesting one or more extensions to the 18-month grant period. The average museum consultation/documentation grant in FY2007 took 29 months to complete (median: 30) with 100% of grantees requesting one or more extensions. The average tribal consultation/documentation grant in FY2007 took 20 months to complete (median: 19) with only 50% of grantees requesting an extension.
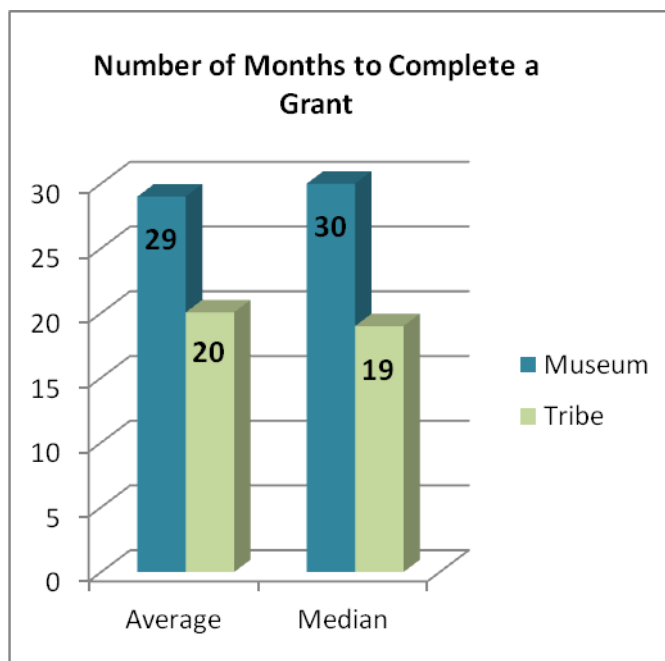
Another way to view this information is on a plotted graph. This type of graph allows one to see the time it took each individual grantee to complete their grant as well as the averages. The median is not plotted so as to not complicate the graph.

The dots are plotted according to the number of months it took the grantee to complete a grant. The lines represent the average number of months it took grantees to complete a grant.

The **blue diamonds** are museum grants.

The **green squares** are tribal grants.

The **blue line** is the average number of months it took museum grantees to complete their grants, 29 months.

The **green line** is the average number of months it took tribal grantees to complete their grants, 19 months.

The **red line** is the average number of months it took all grantees to complete their grants, 23 months.

Number of Months to Complete a Grant
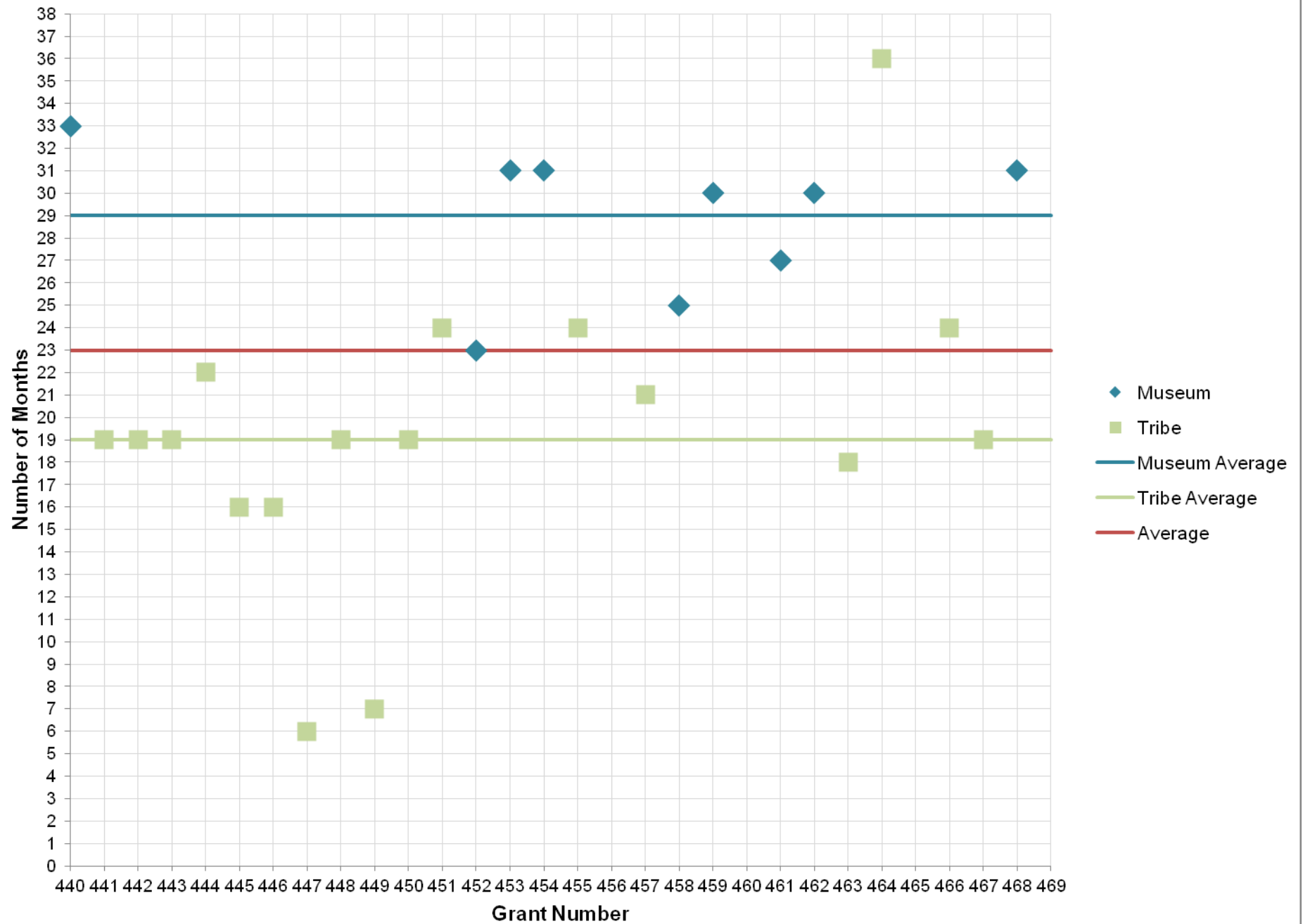
Challenges in Correlating the Data

A quick analysis of the correlation between the types of grant projects and the time it takes to complete a grant did not provide any specific conclusions. As the FY2007 class of grantees was the first to use the new Final Report, the reporting was not always accurate. Misunderstandings of the report questions contributed to this. The data reported does not always match up, for example, a grantee might state that consultation activities were conducted but reports zero consultations conducted in the statistical information part of the Final Report.

One must also take into account the reasons why a grant period was extended beyond the original 18-months. These reasons are presented in the following section. The circumstances surrounding the grant implementation must be taken into account when determining why a grant took longer than originally planned. Outside factors beyond the activities, contribute substantially to the grant implementation period.

Because of these reasons, conclusions cannot be accurately made about the time it takes to complete a grant. In making changes to the reporting requirements for subsequent grantees this problem can be minimized. In order to ensure grantees are on-track with their grant requirements, the Program requires Interim Reports every six months.

Extensions

> **Question: List any amendments to the original Grant Agreement, including extensions. For what reasons was an extension/s sought?**
> **(From Final Report Form- Part I, Question 1)**

Circumstances can change and unforeseen complications can arise, creating a need for grantees to amend their grants. One way in which this is done is through a time extension request. In FY2007, the total number of extensions requested was 18. Extension requests were made by 71% of all grantees, 100% of museums requested one or more extensions and 50% of tribal grantees requested an extension. The following is a list of the reasons why an extension was sought. Please note that more than one reason can be provided for requesting an extension.

Staffing (4)
- One tribal grantee requested an extension to allow staff to complete all grant requirements. It took longer than expected to fill the staff position made available under the grant.
- Two grantees, one museum and one tribal, requested an extension to allow for time to fill a vacancy due to staff leaving during the grant period. Upon filling the vacancy, the necessary staff would be available to complete all grant requirements.
- One museum grantee requested an extension to make up for a decrease in curatorial staff.

Funding (3)
- Two grantees, one museum and one tribal, requested an extension in order to exhaust remaining funds by conducting more consultation visits with tribes/museums.
- One tribal grantee requested an extension to complete the close out of their grant and draw down remaining funds.

Consultations (7)
- Three grantees, one museum and two tribal, requested an extension to accommodate travel for consultations that were delayed.
- Three grantees, one museum and two tribal, requested an extension in order to conduct more consultations with museums.
- One museum grantee requested an extension because the number of tribes to consult with was larger than expected and the deliverables could not be produced if all of the consultations did not take place.

Other (6)
- Five grantees, two museum and three tribal, requested an extension in order to complete all grant requirements.
- One museum grantee requested an extension to address inconsistencies within their forensic consultant's report.

The prevalence and extent of extensions requested suggests that in takes more time than the Program allots to successfully complete a grant. In FY2010, the grant period was extended from 18-months to 24-months, putting it in-line with all of the other National Park Service Historic Preservation grants. Later analyses of subsequent grant classes will determine if this has had an effect of the number of extensions and the time it takes to complete a grant.

IV. PLANNED VERSUS ACTUAL RESULTS

> **Question: Describe any differences between the planned results as listed under Conditions 15 and 16 of the Grant Agreement and the actual results.**
> **(From Final Report Form- Part II, Question 2)**

In the Final Report form, grantees are asked to identify the differences between planned and actual results. Out of the 26 grantees that have closed out their grants, nine identified that there were differences. The differences between planned versus actual results of FY2007 grants were primarily positive. The others were modifications resulting from obstacles and/or changing circumstances.

- Four grantees, three museum and one tribal, found additional human remains and objects not on their initial inventories or summaries.
- Three grantees, two museum and one tribal, were able to schedule additional consultation visits under the grant.
- One museum grantee was able to test additional objects due to low levels of contamination in the original objects.
- One museum grantee was able to fund an additional tribal representative for a consultation visit due to cost savings.
- One tribal grantee was able to submit more claims than originally thought.
- One tribal grantee had to cancel two on-site consultations; instead, they focused on visiting closer museums and increased training.
- One tribal grantee changed their scope of work from a documentation project to a project focused on working with local villages to train and assist them in the claims process for repatriation. This shift was made by the Cultural Committee after re-assessing tribal needs.

V. STATISTICAL INFORMATION

The Final Report form included a section on statistical questions. Information was gathered regarding three areas of NAGPRA activities: repatriation, education/training and community involvement. Responses include only those human remains, cultural items, activities, individuals and institutions that were directly involved or impacted by grant funded activities between the project start and end dates. The tables below follow the order of Part VI of the reporting form:

Repatriation Activities

Question 1, Section 1: What was the number of consultations conducted?

In FY2007, a total of 145 consultations were conducted using grant funding. Museum grantees and tribal grantees conducted about the same number of consultations. The museum average is higher because there were fewer museum grantees, whereas the tribal average is lower because more tribes than museums received grants.

Museum grantees and tribal grantees conducted about the same median number of consultations. The median for museum grants is 2, much lower than the 7.9 average. The reason for this is extremes. One museum grantee cited 43 consultations (including those conducted long-distance, not just visits), which make the total and average higher. The median for tribal grants is 2.5, lower than the 4.6. One tribe cited that 20 consultations were conducted.

In summary, while the total numbers conducted and the average numbers conducted show a high number of consultations occurring, the reality is that the 'typical' number of consultations conducted by museums and tribes through their grant is 2-3.

CONSULTATIONS CONDUCTED	
	Number
MUSEUMS	
Total # conducted	71
Average # conducted	7.9
Median or typical # conducted	2
TRIBES	
Total #	74
Average # conducted	4.6
Median or typical # conducted	2.5
TOTAL OF MUSEUMS AND TRIBES	
Total # conducted	145
Average # conducted	5.6
Median or typical # conducted	2

Questions 2 & 3, Section 1: What was the number of human remains and cultural objects identified for repatriation?

In FY2007, a total of 2,002 human remains and 5,439 cultural objects were identified for repatriation in the course of grants projects.

Museums identified 452 human remains and 21 cultural objects for repatriation. The high museum sum and average for identified human remains can be attributed to grant number 04-07-GP-458 of the Museum of Northern Arizona, AZ (MNA). The objective of the project was to identify human remains recently discovered in their faunal holdings. The MNA identified 299 human remains. Only one museum grantee, Oregon State University, Department of Anthropology, identified only cultural objects under the auspices of their grant (# 41-07-GP-459). They identified 21 cultural objects through consultation visits funded by their NAGPRA grant. Because of these extremes, the average is not reflective of the accomplishments of a typical museum grantee. The median number of human remains identified for repatriation by museums is 4 and the median number of cultural objects identified for repatriation by museums was 0.

Tribes identified 1,539 human remains and 5,418 cultural objects for repatriation. The high numbers can be attributed to only a few grantees. The high number of human remains can be attributed to one grant, 41-07-GP-447 (Confederate Tribes of the Warm Springs Reservation, OR). They identified 1,069 human remains under the auspices of their grant. Two grants contributed to the high number of cultural objects identified. Grant number 55-07-GP-442 (Bad River Band of the Lake Superior Tribe of Chippewa Indians, WI) identified 3,000 cultural objects under the auspices of their grant. Grant number 41-07-GP-447 (Confederate Tribes of the Warm Springs Reservation, OR) identified 1,583 cultural objects under the auspices of their grant. Both grant's objectives were to identify objects in museum collections culturally affiliated with their respective tribes. Because of these extremes, the total average is not reflective of the accomplishments of a typical tribal grantee. The median shows a truer reflection. The median number of human remains identified for repatriation by tribes is 2.5 and the median number of cultural objects identified for repatriation by tribes is 5.

This particular data set clearly shows the benefit of having all the data and not merely averages or median numbers reported. The true picture of the benefit to the NAGPRA process from the expenditure of grant funds is seen in a complete picture of the data. However, for a tribe or museum to gauge realistic accomplishments in any single grant application, having median numbers is informative.

ITEMS IDENTIFIED FOR REPATRIATION UNDER GRANTS		
	Human Remains	Cultural Objects
MUSEUMS		
Total #	452	21
Average #	56.5	2.3
Median or typical #	4	0
TRIBES		
Total #	1,539	5,418
Average #	96.2	338.6
Median or typical #	2.5	5
TOTAL OF MUSEUMS AND TRIBES		
Total #	2,002	5,439
Average #	80.1	209.2
Median or typical #	3	0

Questions 4 & 5, Section 1: How many notices were generated under the grants?

In FY2007, a total of 14 Notices of Intent to Repatriate (NIR's) and 67 Notices of Inventory Completion (NIC's) were identified as being generated through grant funds. The total of all notices generated under a grant comes from only eight grantees. Less than a third of FY2007 grantees generated any type of notice. This analysis will compare those notices stated by museums and tribes as generated with those actually published.

Notices of Intent to Repatriate

> **Definition:** A Notice of Intent to Repatriate (NIR) is published in the *Federal Register* when a museum or Federal agency receives, reviews, and accepts a claim by a tribe for sacred objects, unassociated funerary objects, or objects of cultural patrimony. Such notification is required pursuant to 43 CFR 10.8 (f) prior to transfer of control to the tribe(s). The National NAGPRA program is responsible for publishing NIRs submitted.

Only one museum stated that an NIR was generated as a result of their grant. The average does not say much in this case because the numbers are so low and only one of the nine museum grantees contributed to the number. It only shows that very few NIR's were generated. A median of zero shows that in FY2007, typically no NIR's were generated. Of the one NIR stated, publication occurred.

Tribes stated that 13 Notices of Intent to Repatriate were generated. Only three tribes stated that one or more NIR's were generated. An important factor to note is that grant number 53-07-GP-448 (Confederate Tribes and Bands of the Yakama Nation, WA) stated they generated 10 NIR's. Under the auspices of their grant, the Confederate Tribes and Bands of the Yakama Nation hired a NAGPRA Researcher to initiate consultation visits to museums and submit claims for items to be repatriated. They were successful in this endeavor and plan to apply for additional grants to continue their work. Because the numbers are so low and only three of the 16 tribal grantees contributed to the number, the average does not say much. It only shows that very few NIR's were generated. A median of zero shows that in FY2007, typically no NIR's were generated. Of the total 13 NIR's, seven could be identified as published. However, an observation can be made that when a tribe obtains a NAGPRA grant to focus upon claims for cultural items from museums, that project can be successful. This grant can be identified as an activity model.

NOTICES OF INTENT TO REPATRIATE		
	Claimed in Final Report	Published to Date
MUSEUMS		
Total #	1	1
Average #	.1	--
Median or typical #	0	--
TRIBES		
Total #	13	7
Average #	.8	--
Median or typical #	0	--
TOTAL OF MUSEUMS AND TRIBES		
Total #	14	8
Average #	.6	--
Median or typical #	0	--

LIST OF NOTICES OF INTENT TO REPATRIATE GENERATED AS A RESULT OF A GRANT		
Grant #	**Recipient**	**Published in Federal Register**
41-07-GP-445	Confederate Tribes of the Umatilla Reservation, OR	Volume 73, Number 135, Page 40363-40364, July 14, 2008
53-07-GP-448	Confederate Tribes and Bands of the Yakama Nation	Volume 74, Number 42, Page 9624, March 5, 2009 Volume 74, Number 42, Page 9624-9625, March 5, 2009 Volume 75, Number 163, Page 52013-52014, August 24, 2010 Volume 73, Number 62, Page 16902, March 31, 2008 Volume 76, Number 229, Pages 73663-73664, November 29, 2011
53-07-GP-449	Cowlitz Indian Tribe	Pending publication
06-07-GP-464	Smith River Rancheria, CA	Volume 72, Number 243, Page 71951-71952, December 19, 2007
53-07-GP-452	Eastern Washington State Historical Society (Northwest Museum of Arts and Culture)	Volume 75, Number 185, Page 58424-58425, September 24, 2010
**This chart is only those notices able to be identified, there could be more		

Notices of Inventory Completion

> **Definition:** A Notice of Inventory Completion (NIC) is published in the Federal Register when a museum or Federal agency has made a determination of cultural affiliation, or geographical connection for culturally unidentifiable Native American human remains and associated funerary objects in its control. Such notification is required pursuant to 25 USC 3003 (d) and 43 CFR 10.9 (e) and 10.11. The National NAGPRA program is responsible for publishing NIC on behalf of museums and Federal agencies.

Museums stated that 31 NIC's were generated. One museum grantee, grant number 41-07-GP-459 (Oregon State University, Department of Anthropology, OR) contributed significantly to this number, stating 21 NIC's. The grant objective was to consult with tribes to complete their inventory. The average is highly affected by the 29 NIC's claimed by Oregon State University. In this case, the median is important because it shows that in FY2007, typically zero NIR's were generated. Of the total 23 NIC's stated, 23 could be identified as published.

Tribes stated that 36 NIC's were generated. One tribal grantee, grant number 53-07-GP-448 (Confederate Tribes and Bands of the Yakama Nation, WA) contributed highly to the total number, stating to have generated 26 NIC's. The Confederate Tribes and Bands of the Yakama Nation hired a NAGPRA Researcher to initiate consultation visits to museums and submit claims for items to be repatriated. The average shows that very few NIC's are being generated because the numbers are so low and only three of 16 tribal grantees contributed to the number. A median of zero shows that in FY2007, typically no NIC's were generated. Of the total 36 NIC's stated, zero could be identified as published.

Note that museums consult with tribes in the formulation of the NAGPRA inventory and the inventory entries should all result in NICs. However, NICs are not claims based as are NIRs. Thus, tribes may identify cultural affiliation or geographical nexus to culturally unidentifiable Native American human remains, but the decision in the inventory and the publication of NICs rest with the museum or Federal agency. The result of this study reflects that tribes regarded 36 NICs as available to be published as a consequence of the grant project, but that none of the 36 could be identified as actually published as of November 2011, when the study data was accumulated, with the information provided in the final reports. As 2011 was the first year to lend itself to this study, it is impossible to know if this year is reflective of a trend or is an outlier. The disparity is significant, however, and begs further study.

NOTICES OF INVENTORY COMPLETION		
	Claimed in Final Report	Published to Date
MUSEUMS		
Total #	23	23
Average #	2.6	N/A
Median or typical #	0	N/A
TRIBES		
Total #	36	Unknown
Average #	2.1	N/A
Median or typical #	0	N/A
TOTAL OF MUSEUMS AND TRIBES		
Total #	59	23
Average #	2.3	N/A
Median or typical #	0	N/A

In response to the lack of information available to determine if NIC's identified by tribes as available to publish were actually published, revisions were made to the final report form for 2012. Please see the later section for an explanation of the full revisions.

LIST OF NOTICES OF INVENTORY COMPLETION GENERATED AS A RESULT OF A GRANT		
Grant #	**Recipient**	**Published in Federal Register**
53-07-GP-452	Eastern Washington State Historical Society (Northwest Museum of Arts and Culture)	Volume 75, Number 185, Page 58429-58430, September 24, 2010
41-07-GP-459	Oregon State University	Volume 76, Number 140, Pages 43714-43715, July 21, 2011
Volume 76, Number 140, Pages 43716-43718, July 21, 2011
Volume 74, Number 128, Page 32189, July 7, 2009
Volume 74, Number 47, Page 10765-10766, March 12, 2009
Volume 74, Number 99, Page 24876-24878, May 26, 2009
Volume 74, Number 20, Page 5859-5860, February 2, 2009
Volume 74, Number 20, Page 5858-5859, February 2, 2009
Volume 73, Number 104, Page 30973-30974, May 29, 2008
Volume 73, Number 101, Page 30155-30156, May 23, 2008
Volume 73, Number 101, Page 30154-30155, May 23, 2008
Volume 73, Number 101, Page 30153-30154, May 23, 2008
Volume 73, Number 75, Page 20946-20947, April 17, 2008
Volume 73, Number 75, Page 20947-20948, April 17, 2008
Volume 73, Number 75, Page 20946, April 17, 2008
Volume 73, Number 75, Page 20945, April 17, 2008
Volume 73, Number 75, Page 20944-20945, April 17, 2008
Volume 73, Number 75, Page 20944, April 17, 2008
Volume 73, Number 75, Page 20943-20944, April 17, 2008
Volume 73, Number 62, Page 16903-16904, March 31, 2008
Volume 73, Number 37, Page 10059, February 25, 2008
Volume 72, Number 210, Page 61670-61672, October 31, 2007
08-07-GP-468	University of Colorado, Boulder	Volume 75, Number 140, Page 42771-42773, July 22, 2010
41-07-GP-447	Confederate Tribes of the Warm Spring Reservation, OR	Unable to Determine
53-07-GP-448	Confederate Tribes and Bands of the Yakama Nation	Unable to Determine
53-07-GP-449	Cowlitz Indian Tribe, WA	Unable to Determine
32-07-GP-450	Duckwater Shoshone Tribe of the Duckwater Reservation, NV	Unable to Determine
**This chart is only those notices able to be identified, there could be more		

Analysis of Challenges in Reporting the Data about Notices

There were significant challenges in determining the number of notices claimed and published. The first being that the information asked for in this section was the "number of Notices of Intent to Repatriate generated as a result of the grant" and the "number of Notices of Inventory Completion generated as a result of the grant." The information included notices intended to be published, notices in the process of being written/published and notices already published. Separating notices stated into these categories and determining how many were actually published proved to be a challenge. As the notices published were not reported, they were determined though correlating information such as notices mentioned, consultations, tribe names and museums names, and grant start and end dates in the grant final report to the information maintained in the National NAGPRA Program notice database. Correspondence with several grantees took place in order to make the final determinations.

Note that there is the chance that this is not complete information, but it the best possible to date. The publication of notices associated with grants may likely be higher than reported at this time, as there may simply be a delay from the closure of the grant to the preparation and publication of the technical document. It is not unusual for notices to be approved in a museum or Federal agency hierarchy prior to submission to the National NAGPRA Program for publication.

Question 1, Section 2: What was the number of trainings presented, people attending the training, outside training attended and the number of people attending outside training?

The FY2007, Grant Guidelines state that grant projects may involve "training staff in the fundamentals of NAGPRA and in techniques for documenting the cultural affiliation and/or treatment history of cultural items." Grantees incorporated training into their grant projects in a variety of ways, including conferences, workshops and topic-specific trainings. Some training sessions were hosted or held in-house by the grantee, and other times staff attended training given by others, referred to here are "outside" training.

Receiving training is a common objective in the grant applications. Trainings include general information sessions on NAGPRA, webinars put on by the Program, such as training on managing a NAGPRA grant, workshops hosted by museums/tribes on issues relating to consultation, identification of CUI remains and objects, contamination issues and curation issues.

In looking at the chart below, it is easy to see that tribal grants have much higher training numbers than museum grants. There were three grants, one museum and two tribal, that had very high participation numbers for trainings/workshops presented by the grantees.

One museum grant, to the San Diego Museum of Man, CA (06-07-GP-462), funded eight, one-day trainings that had 134 participants. The trainings taught participants the fundamentals of NAGPRA and how to recognize cultural objects. The participants were tribal members who were part of the Red Tail Monitoring and Research, Inc, a Native American archaeological site monitoring company.

TRAINING				
	# of trainings/ workshops presented by grantee	# of people attending trainings/ workshops presented by grantee	# of outside trainings/workshops attended by grantee	# of people attending outside trainings/workshops
MUSEUM				
Total #	16	237	3	3
Average #	1.8	26.3	0.3	0.3
Median #	0	0	0	0
TRIBE				
Total #	17	508	14	82
Average #	1.1	31.8	0.9	5.1
Median #	1	9.50	0	0
TOTAL				
Total #	35	765	18	87
Average #	1.4	29.4	0.7	3.4
Median #	1	9.5	0	0

The two tribal grants were grant number 06-07-GP-466 (Susanville Indian Rancheria, CA) and grant number 02-07-GP-467 (Central Council of Tlingit and Haida Indian Tribes, AK). The Susanville Indian Rancheria had 200 participants in 6 meetings of the Northeastern California Tribal NAGPRA Coalition. The CCTHITA presented to 150 students at the University of Pennsylvania during their consultation visit to inform them about objects, their cultural importance and their use in ceremonies (as understood by the Final Report).

Questions 1-4, Section 3: What was the number of tribes, museums, other institutions, or other individuals participating in the grant?

Community involvement numbers are important, as they speak to the full range of groups and individuals touched by NAGPRA activities. These numbers show the effectiveness of grants to facilitate participation. They show the "true" reach of NAGPRA grants.

The question asking the number of institutions participating in the grant has the potential to be interpreted incorrectly. The question was intended to capture any institutions, not defined as a museum under NAGPRA, such as a non-profit entity or cultural resource management firm. Institutions such as a university or federal agency are defined in the regulations as "museums." This confusion means that the data for museums and institutions could be slightly irregular. In order to eliminate confusion in this report, the 'institutions' from the question will be referred to as 'other institutions.' The form has been amended to better define and thus capture the information intended from asking 'other institutions,' which would allow the analysis to better identify categories and areas of grant impact.

In FY2007, a total of 162 museums (not including grantees), 455 tribes (not including grantees), 27 other institutions, 639 individuals and 10 consortiums were involved in grant activities.

The total museum numbers and total tribal numbers look promising, indicating that there is high involvement in tribal grants. There are several grants contributing very high numbers of involvement, which may skew the data. Totals and averages are easily affected by extreme numbers; which is the case with this data. Still the total picture is positive.

INVOLVEMENT THROUGH GRANT ACTIVITIES					
	Tribes	Museums	Other Institutions	Individuals	Consortium
MUSEUM					
Total #	98	4	6	27	2
Average #	10.9	.4	0.7	3	0.2
Median #	2	0	0	1	0
TRIBE					
Total #	49	449	20	612	7
Average #	3.3	29.9	1.3	40.8	0.4
Median #	1	2	0	7	0
TOTAL					
Total #	162	455	27	639	10
Average #	6.5	18.2	1.1	25.6	0.4
Median #	1	1	0	5	0

The first significant difference in data is in tribal grantees claiming museum involvement. Grant number 02-07-GP-455 (Hydaburg Cooperative Association, AK) claimed the involvement of 400 museums. As part of their grant, the Association sent out 1,200 letters to all museums, in all 50 states. They received 114 summaries from museums with Haida artifacts or human remains and 285 letters from museums stating that they do not have any items. While this number is involvement and provided data of importance to the requesting tribe, it is not direct contact and is being considered irregular.

The second significant difference in data is in tribal grantees claiming individual involvement. Grant number 06-07-GP-464 (Smith River Rancheria, CA) claimed the involvement of 437 individuals. Through reading the final report, it is assumed that these individuals are comprised of NAGPRA Committee members, project staff, staff from consultation meetings, attendees from North Coast NAGPRA Coalition meetings and Tribal Council meetings open to the public. While this is an outlier in the data, the importance of the project must be recognized for the number of people that were afforded direct contact with the NAGPRA process in some way.

Question 1, Part IV: What were the major obstacles faced in implementing the grant?

With every project there are always obstacles to overcome. A broad range of obstacles were identified by grantees as impeding their grant.

Listed are the obstacles identified in writing in grantee's final reports. Of the 26 closed grants, 16 grantees identified obstacles.

Administrative Problems (3)
- One tribal grantee had difficulty working with the Historic Preservation Grants Division
- Two tribal grantees reported that lack of internal support from the tribal administration and/or finance department inhibited their grant.

Infrastructure (8)
- Two grantees, one museum and one tribal, said that a lack of facilities to house/inter repatriated human remains and materials was an obstacle.
- One tribal grantee reported that they lacked adequate staff to do the work.
- Three grantees, two museum and one tribal, had changes in personnel.
- Two grantees, one museum and one tribal, had to change workspaces several times causing breaks in work.

Working Together (16)
- Three grantees, one museum and two tribal, reported that working past negative assumptions about museum practices was a challenge they faced.
- Six grantees, three museum and three tribal, found that finding dates that worked with all parties to meet was difficult.
- One tribal grantee had difficulties with tribal members keeping their commitments.
- One museum grantee experienced problems when outside institutions/individuals working on aspects of the grant did not meet deadlines and presented poor work.
- One tribal grantee found that it was difficult to keep all parties on the same page.
- Two tribal grantees faced problems when a museum listed in their grant closed down and consultations were not able to take place.
- One tribal grantee faced problems with unhelpful staff at museums.
- One tribal grantee felt that the burdensome amount of paperwork required to go through the NAGPRA process inhibited their project.

Other (4)
- One tribal grantee realized that they were trying to do too much in one grant cycle.
- Two museum grantees had problems with severe weather inhibiting travel. One had problems scheduling travel to rural villages for tribal meetings and the other had problems scheduling travel due to conditions in Chicago.
- One tribal grantee experienced problems tracking down ownership/authority for sites with human remains.

VI. Question 4, Part II: What was the larger impact of the project on the institution/community?

There is a broad range of objectives identified in each grant but they do not always cover the scope of what a grant can accomplish. Many activities funded under NAGPRA grants have an impact beyond the deliverables required in the Grant Agreement. A section of the Final Report allows grantees to identify these larger impacts. Many of these larger impacts involve relationship-building and improved understandings between museums and tribes, and a greater understanding of the complexities of NAGPRA activities/consultation.

Of the 26 closed grants, 24 grantees identified a larger impact as a result of the NAGPRA grant.

Information Building (21)
- Three grantees, two museum and one tribal, discovered additional human remains and objects not listed in museum records.
- Twelve grants, three museum and nine tribal, felt that they gained increased knowledge of NAGPRA.
- One tribal grantee found an unanticipated number of remains/materials identified as "Chippewa" rather than a specific tribe. This discovery created a need for additional research to be conducted before repatriation could take place.
- Two grantees, one museum and one tribal, furthered museum goals to account for all human remains within the collections.
- Three grantees, one museum and two tribal, felt that their grant allowed for increased accessibility to museum's collections.

Program Building (4)
- Three grantees, one museum and two tribal, felt that their grant increased the tribe's ability to begin making repatriation claims.
- One tribal grantee reported that the grant enabled them to hire additional staff.

Community Building (19)
- Thirteen grantees, seven museum and six tribal, built relationship with outside tribes, museums, or agencies during the course of their grant.
- Five tribal grantees experienced internal community building.
- One tribal grantee was able to clarify the tribal museum's role as a partner in the community's repatriation work.

Sense of Purpose (7)
- Six grantees, one museum and five tribal, developed a greater sense of purpose during their grant period.
- One tribal grantee felt that past injustices were being rectified through repatriation.

VII. Question 5, Part II: Explain ongoing plans after the project?

Identification of ongoing plans can help the Program understand what museums and tribes look to accomplish in the future and can help the Program prepare for these plans and support their work.

> **Question: As applicable, explain any plans for ongoing funding, expansion, modification, or replication of the project.**
> **(From Final Report Form- Part II, Question 5)**

Of the 26 closed grants, 17 grantees identified ongoing plans.

Grants (13)
- Thirteen grantees, five museum and eight tribal, plan to apply for additional NAGPRA grants.

Consultation/Documentation (9)
- Six grantees, two museum and four tribal have plans to continue collaborative efforts between tribes regarding consultation, identification and repatriation activities.
- One museum grantee does not have plans to continue work on the specific project completed under the grant.
- One museum grantee plans to pursue greater clarity/distinction between state and Federal control.
- One museum grantee plans to cross-reference all of their databases to ensure all NAGPRA-related remains and material are reported.

Repatriation (2)
- One tribal grantee intends to work towards repatriation of identified human remains and objects.
- One tribal grantee plans to begin utilizing the Central Council of Tlingit and Haida Indian Tribes of Alaska to handle repatriations.

Training (1)
- One museum grantee plans to pursue more training on contamination issues for the community.

Community (4)
- Two tribal grantees plan to develop a Cultural Center.
- One tribal grantee plans to add more tribes to the established coalition.
- One museum plans to continue work with their coalition to determine their next steps.

VIII. Question 2, Part IV: Provide suggestions of how the National NAGPRA Grant Program can better support grant implementation efforts.

The Final Report asks for feedback from grantees on how the Program is effective or ineffective and requests suggestions for improvement. These suggestions will be used to better support future grantees.

Of the 26 closed grants, 21 provided suggestions.

Grant Administration

Accessing Assistance (9)
- Six grantees, two museum and four tribal, reported that the NAGPRA Grant team was prompt and helpful.
- Two grantees, one museum and one tribal, said that it was helpful to be able to seek advice from the Program.
- One tribal grantee asked that the Program provide information on other funding sources.

Greater Administrative Oversight from Program (6)
- Three tribal grantees asked that there be more oversight from the Program throughout the grant period.
- Two tribal grantees asked that there be more training for finance departments on grant administration.
- One tribal grantee suggested that there be more technical assistance from the Program, such as putting more information on the web.

Improve Administrative Processes (9)
- One museum grantee suggested that the Program email reminders of report due dates.
- One museum said that it would be helpful that when a modification request is submitted, an email is sent out acknowledging receipt of the request.
- One tribal grantee requested that the amount of paperwork be reduced to make the NAGPRA process easier.
- One tribal grantee suggested that the grant process and progress report forms be simplified.
- One museum suggested that the modification process be sped up.
- One tribe requested that the grant agreement be improved to include all of the required administrative duties, as in their experience they were required to complete reports that were not listed on the grant agreement.
- One tribe reported that the NPS grant requirements were not what they initially expected.
- One museum grantee reported that submitting requests for funding was cumbersome.
- One museum grantee requested that the cumbersome SMARTLINK process be avoided and grant monies go straight into bank accounts.

Grant Application

Application Form (3)
- Two grantees, one museum and one tribal, requested that the budget section of the grant be turned into an excel spreadsheet.

- One tribal grantee asked the Program to remember that tribes have different levels of understanding of NAGPRA which affects their ability to write grants and understand the legislation.

Grant Polices and Program Structure (14)

One museum grantee suggested that the grant period should be extended to a three year period, where funds are released yearly after receipt of an annual progress report. They believed that this extended period would allow for consistent oversight of all phases of the NAGPRA Process. When the grant period ends, and grant funds are used up at the end of the 18-month period, NAGPRA duties fall to several part-time people. Consistency and information are lost resulting in different databases created and creating chaos.
- Five grantees, one museum and four tribal, asked for greater funding.
- Two tribal grantees asked that there be a process to access NAGPRA funds in a non-competitive manner, based on need.
- One museum grantee requested that there be consistent NAGPRA grants funding.
- Two tribal grantees suggested that grants should be awarded to museums for completing inventories and other work related to repatriation. They feel that money used to be granted for these activities but it has not been the case for many years.
- One museum grantee suggested that funding be given for research. They feel that research is just as important as consultation and that consultation should not be the only focus of NAGPRA grants. The archival materials with information about objects in the collections would help with consultations but there is no source of funding to organize and study this material.
- One tribal grantee suggested that funding be provided for professional quality reports that can be distributed to a wider audience.

Policy Focus (1)
- One tribal grantee suggested that there be an increased focus on preservation of valuable items.

Other Training/ Technical Assistance (4)

- One museum grantee requested that there be more training available in the area [Arizona] so that Elders can attend.
- Two grantees, one museum and one tribal, suggested that there be assistance at the national level with creating regional consortiums.
- One museum grantee suggested that the process for returning individuals listed as CUI be made easier for tribes (Suggestion was prior to the passage of the CUI rule).

Programmatic response to the suggestions

The Program has been actively pursuing ways to improve both the ability of applicants to successfully apply for grants as well as ways to streamline grants management requirements. Since 2009, the Program has provided a two hour webinar on administering a NAGRA grant for new awardees. The annual webinar, done in partnership with the Historic Preservation Grants department reviews grant requirements, explains how to fill out the required financial forms, and explains how to request a modification to the grant. The webinar presentation, along with all forms and templates are available on the website under Information for Grantees.

In FY2011, the Program conducted a thorough review of all grants submitted since 1994, and compiled an inventory of notable projects and grants deliverables.   This project is intended to be a resource for grantees to access information about successful, creative grants. Beyond online assistance and resources, the grants administration staff is always available to personally assist grantees throughout the period of their grant.

In addition, the National Park Service is looking at ways to streamline processing reports and modification requests to help reduce the wait time. One major upcoming change is the switch to a new grants management system called FBMS, which is slated to be in use by November 2012. The goal of FBMS is to streamline the administrative processes and the way funds are disbursed. A major training effort for all grantees is being planned to coincide with the roll out of FBMS. Following this report, the grants Final Report form will change to better capture the information intended to be gleaned. As part of this change, the budget section may become a Microsoft Excel spreadsheet.

The Program has made significant efforts to outreach to both new grantees as well as those that have been unsuccessful in their efforts to secure a NAGPRA grant. In partnership with the National Preservation Institute, the National NAGPRA Program held four onsite training courses entitled Writing and Managing a NAGPRA Grant. The training's were held between 2009 and 2012. They were held in Seattle, Chicago, Phoenix and Minneapolis, and Santa Fe, and reached almost 100 museums, tribes and NHO representatives. These locations were selected in order to better serve the constituents in these areas. Additionally, a training DVD dedicated to writing a NAGPRA grant was produced in FY2010 and is available on YouTube, linked through the National NAGPRA Program website.

The National NAGPRA Program has used the webinar series as a forum for training NAGPRA coordinators on a variety of implementation issues. Suggestions provided above could be addressed through this forum.
Suggestions for changing the grant policies and program structure are the hardest to address, but are no less important. Funding has always been an area of concern and this report brings together the specific concerns and suggestions for improvement by FY2007 grantees. NAGPRA grant funding is dependent on cCongressional appropriation. Recently, the Program has funded research to look into the attributes of tribal programs that lead to successful grant implementation and how NAGPRA grants can be awarded to develop those attributes. This research will support the National NAGPRA Review Committee's requests to Congress for increased funding.

IX. DISCUSSION OF ANALYSES

This report analyzes the results of the FY2007 NAGPRA Consultation/Documentation grants. The FY2007 grantees were the first group of grantees to almost exclusively complete their grants in 2011, utilizing the new reporting tool. The revised Final Report form was designed to allow for a more comprehensive collection of information about the outcomes, cumulative progress and the effectiveness of contributions to NAGPRA implementation by museums, tribes and Native Hawaiian organizations. These observations should prove useful to the Program as measures of success and to grantees as a picture of what is achievable.

In listing the grants awarded and not awarded, an analysis was made about why those not awarded did not receive funding. While not part of the Final Report requirements, this analysis provides important information for future grantees. Through recording these suggestions, the Program can track improvement. Since FY2007, the Program has already seen a noticeable change in strong applications. Grants are reviewed and scored (ranked) for funding by an outside panel. A more in-depth look at the grant proposal scores may show that the competiveness of receiving a grant has increased due to the quality of the applications.

Through listing the grants awarded and not awarded and their amounts, and separating them by state, one can see the large divide between regions. The West Coast and Alaska are the most active regions for NAGPRA grants. The South is the most inactive region in NAGPRA grants. By identifying that the South is not active in NAGPRA grants, the Program can look at the region's activity as a whole and begin to understand why tribes and museums are not using grant funding to conduct NAGPRA activities. Knowing the areas where the money is going, the Program can better understand where attention needs to be focused to educate the public about NAGPRA grants and their impact on NAGPRA activities. Although not the focus of this study, further research into why the South in not active in NAGPRA grants would be beneficial to the Program and applicants. By identifying an underserved region, the Program can then react to better serve it.

Many different activities were conducted through FY2007 consultation/documentation grants. The most common was consultation, as 21 of the 26 grantees carried out consultations. The second most common activity was documentation. As part of their grant, 13 grantees performed research and documentation activities. Over a third of the grantees incorporated training into their grants. Training was delivered to newly hired staff, current staff, and provided by the grantee to others in the community. Something interesting to note is that even after 20 years of NAGPRA being in effect, grants are still being sought to update inventories and summaries (7 grants) and develop databases to hold the information (8 grants).

In FY2007, over 70% of grantees asked for an extension to their 18-month grant period. Upon completion, it took museums an average of 29 months to complete their grant, and tribes an average of 20 months. Identifying correlations between the length of time it takes to complete a grant and the types of projects being conducted was inconclusive. While there very well may be a several conclusions that could be made, they cannot be made using the data from FY2007 grantees. The reporting was such that it was not always accurate, probably due to misunderstandings of the questions. Making changes to the way the questions are asked and the type of response required in the Final Report form will allow this analysis to be accurately made in future reports.

The repatriation/disposition of Native American human remains and cultural objects is the ultimate goal of NAGPRA grants. The statistical information provided several interesting findings. First, the number of consultations conducted by museums and tribes was about equal.

The typical number of consultations conducted during a grant period was 2-3. A problem with this data is that it does not differentiate between the types of consultation - written, long-distance communication or an actual visit - that were conducted. By differentiating the type of consultation, the depth can be better measured. A letter saying a museum has no objects is not comparable to a 3-day consultation visit at a museum.

Also collected was statistical information regarding the number of human remains identified and the number of sacred items and/or objects of cultural patrimony identified for repatriation/disposition, referred to as cultural objects. In FY2007, the question regarding cultural objects was misunderstood and has since been clarified in newer Final Reports. The major finding from this information was that a few museums and tribes are identifying a large number of objects. This finding is in conflict with the number reported under project activities for research and documentation. Thirteen grants were involved in research/documentation activities but only a few reported that they identified objects. Three grants, two from museums and three from tribes, contributed to the bulk of the number identified.

The last statistical information collected about repatriation activities was the number of Notices of Intent to Repatriate and the number of Notices of Inventory Completion generated under the grant. Although the numbers were provided by the grantees, they were difficult to analyze. This question does not differentiate between those intended to be written, those written and submitted for publication and those published. The question also does not require grantees to provide the ID numbers associated with notices, so it is difficult to track them. In order to determine the impact, notice claims had to be matched with notices in the Program database and sometimes communication with grantees took place to make a final determination.

Another difficulty in quantifying the number of notices to result from a grant is that tribes cannot publish a notice, so those stated as generated under the grant were actually generated by museums. It required large amounts of research to identify correlating notices. Therefore, any number of notices produced in FY2007 with the use of NAGPRA grant funds is not an absolute number. This is an area of the Final Report that can be improved in the future.

With the information available, the most notable finding regarding notices is that a few museums and tribes are producing a large number of the notices. The typical grant produced zero notices. This report did not evaluate the number of notices resulting from a grant based upon whether it was the stated goal of the grant project to result in notices. Some grant projects build capacity for eventual repatriation activities across a broad spectrum over time.

As training has become a large part of success in the NAGPRA process, it is a typical objective identified in grants. The statistical information collected shows that museum and tribal grantees presented about the same number of trainings. However, attendance at these trainings was much higher for tribal grantees. As with the repatriation statistics, there were a few museums and tribes that contributed to a greater part of the total people in attendance. Even so, the median was higher for tribal grantees, while the median for museum grantees was zero. The number of outside trainings/workshops attended by tribal grantees and the number of people attending trainings/workshops sponsored tribes was much higher than museums. According to these findings it appears that tribes are seeking more training than museums.

Through the collection of involvement numbers, statistically, the Program can demonstrate the 'true' reach of grants. Similar to the other statistical numbers, there were two tribes that contributed high numbers that skewed the data. Leaving out the extremes, the finding is that tribes work equally with museums and other tribes in their grants, while museums work more with tribes than other museums. One reason for this could be that tribes are working together to

collect and share information about museum collections. Tribes also have a higher individual participation number. This appears to be because of the many tribal representatives with cultural knowledge that participate in consultations.

Besides statistical information, grantees were also asked to comment on other aspects of their grant. Grantees were asked to explain any differences between the activities planned versus actual results. This is important to know because it helps the Program understand if the scope of work is proportional to the amount of time allotted in the grant period and the dollar amount awarded. The typical difference noted by grantees was that they were able to do more than initially expected. More human remains and objects were identified, more consultation visits scheduled, more objects tested for contamination, more tribal consultants hired and more repatriation claims submitted. This information is useful because it provides a baseline for creating a realistic analysis of what can be accomplished by a grantee in one grant.

Time to complete projects during the grant period was not the only obstacle grantees faced. The most commonly identified obstacles involved working together. Finding workable dates to meet, overcoming negative assumptions, museums closing, problems with information sharing and keeping commitments, missed deadlines, and presenting poor work were all identified as obstacles. Obstacles related to staffing problems, work space, and lack of support from administration and financial departments were also identified as impeding the success of the grant. While some of these obstacles cannot be overcome, they can be anticipated. There is value in knowing that obstacles faced by grantees are commonly encountered throughout the country.

Some obstacles can be addressed by the Program, specifically, the sense that there is a burdensome amount of paperwork. Much of this sentiment can likely be attributed to the implementation of more rigorous reporting standards. While parts these requirements cannot be helped, as they come with receiving a Federal grant, it is something the Program can think about when providing technical assistance regarding grant requirements.

Identifying the larger impact of grants beyond the creation of grant deliverables, is important for understanding the true reach of NAGPRA. The most noticeable impact identified was the building of relationships between museums and tribes. During the early years of NAGPRA, getting beyond the initial misgivings and feelings of distrust was a major issue. That museums and tribes are reporting that they have been able to build strong relationships and partnerships is a positive result. Also reported as a larger impact, was an increase in knowledge about NAGPRA. Through work conducted for the grant, grantees gained a better understanding of what NAGPRA entails and how to implement the law, resulting in a greater sense of purpose.

In the spirit of improvement, the Final Report asks grantees to give two specific suggestions for improving the Program's effectiveness. The most common response to this question was that the NAGPRA Grant team was prompt and helpful during the period of their grant. At the same time, many grantees had suggestions for improving the administrative requirements of the grant. The most common was asking for more oversight from the Program throughout the grant period. This is something the Program is already working toward through webinars, updates to the website and increased email communication.

The second most common suggestion received in the Final Report was for greater funding. Grantees had several suggestions for the kinds of funding they believe would better support their NAGPRA efforts, including consistent funds, non-competitive funds, funds for archival research, funds for professional quality report publications and more money for museums to update their inventories and summaries. Interestingly, it was tribes that requested that museums be awarded

money to complete their inventories and summaries. The reason, most likely, is that until they do, tribes cannot effectively consult with them and cannot facilitate repatriations.

The Program has been able to respond to some of these suggestions, improving on the grants process. While the responses may not be a direct result of these particular suggestions, they do address the needs identified by FY2007 grantees. Since 2009, new grantees have been able to attend a two-hour webinar on how to administer their NAGPRA grant. All of the information in the webinar, along with all of the necessary forms is posted online. Beyond online information and trainings, the grants administration staff is always available to personally assist grantees throughout the period of their grant. In an effort to streamline the grants process, the National park Service is switching to a new grants management system called FBMS, which will help streamline the grants process.

NAGPRA is an on-going process and even after 20 years, museums and tribes remain active in consultation, documentation and repatriation activities. In order to better understand and plan for the future, the last question in the Final Report asks grantees about their on-going plans. This question has been interpreted two ways, one as on-going plans for the grant project and on-going plans for NAGPRA activities. Thirteen grantees responded that they plan to apply for additional NAGPRA grants. Activities to be continued are the same as those conducted in the FY2007 grant projects. Some activities are beyond the scope of a NAGPRA grant, such as one tribe's desire to build a Cultural Center.

X. CONCLUSION

As of the publication of this report, the NAGPRA Grants Program has helped fund the NAGPRA activities of Indian tribes, Native Hawaiian organizations and museums for 17 years. In order to begin measuring success, the Final Report form was revised in FY2008 to capture the full scope of work done by grantees, beyond the deliverables. A series of qualitative and quantitative questions were developed for grantees to answer about their grant activities. This report analyzed the responses of FY2007 grantees and identified what they have been able to accomplish during the grant periods. The report highlighted the successes and challenges. It provided statistical information on repatriation activities, trainings and involvement. Additionally, obstacles, future plans and suggestions for the improving the Program were analyzed.

After 20 years of NAGPRA, the work is not done, nor will be done in the near future. This report, and reports in following years, should prove beneficial to the Program, drawing attention to areas of success and identifying areas for development and improvement.